## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

ACQIS LLC,

a Texas limited liability company,

Plaintiff,

v.

PANASONIC HOLDINGS CORP. et al.,

Defendants,

ZT GROUP INT'L, INC.,

Defendant,

ADVANTECH CO., LTD.,

Defendant,

MICRO-STAR INTERNATIONAL CO., LTD. et al.,

Defendants,

CISCO SYSTEMS, INC.,

Defendant.

**JURY TRIAL DEMANDED** 

Civil Action No. 6:23-cv-00880-ADA

Civil Action No. 6:23-cv-00881-ADA

Civil Action No. 6:23-cv-00882-ADA

Civil Action No. 6:23-cv-00883-ADA

Civil Action No. 6:23-cv-00884-ADA

<u>DECLARATION OF KRISHNAN PADMANABHAN IN SUPPORT OF DEFENDANTS'</u>
COORDINATED OPENING CLAIM CONSTRUCTION BRIEF

I, Krishnan Padmanabhan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney with the law firm Winston & Strawn LLP and am counsel of record

for Defendant Cisco Systems, Inc. ("Cisco"). I have personal knowledge of the matters set forth

in this Declaration. I offer this Declaration in support of Defendants' Coordinated Opening Claim

Construction Brief.

2. Attached hereto as Exhibit 55 is a true and correct copy of an excerpt of Merriam-

Webster's Collegiate Dictionary (10th Ed. 1997), produced in Civil Action No. 6:23-cv-00884-

ADA with Bates number CISCO-ACQIS00000149.

3. Attached hereto as Exhibit 56 is a true and correct copy of an excerpt of The

Merriam-Webster Dictionary (Revised Ed. 2022), produced in Civil Action No. 6:23-cv-00884-

ADA with Bates number CISCO-ACQIS00000150.

4. I declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct.

Dated: November 1, 2024

/s/ Krishnan Padmanabhan

Krishnan Padmanabhan

2